

**INTERROGATORIES**

**Do you find from a preponderance of the evidence that:**

**INTERROGATORY NUMBER 1:**

- (1) James Blackstock subjected the plaintiff to a hostile work environment?

Each plaintiff has the burden of proof on her individual claim by a preponderance of the evidence.

Answer "Yes" or "No" as to each plaintiff:

a. Mikki Kalina

YES

b. Estella "Christy" Strawn

YES

c. Rebecca "Becky" Sirmans

YES

**INTERROGATORY NUMBER 2:**

- (2) James Blackstock violated the bodily integrity of the plaintiff?

Each plaintiff has the burden of proof on her individual claim by a preponderance of the evidence.

Answer "Yes" or "No" as to each plaintiff:

a. Mikki Kalina

YES

b. Estella "Christy" Strawn

YES

c. Rebecca "Becky" Sirmans

YES

**INTERROGATORY NUMBER 3:**

- (3) James Blackstock intentionally inflicted emotional distress upon the plaintiff?

Each plaintiff has the burden of proof on her individual claim by a preponderance of the evidence.

Answer "Yes" or "No" as to each plaintiff:

a. Mikki Kalina

YES

- b. Estella "Christy" Strawn YES
- c. Rebecca "Becky" Sirmans YES

Only if you have answered Interrogatory Number 1, 2, or 3 "Yes" as to one or more of the plaintiffs, then answer Interrogatory Number 4.

**INTERROGATORY NUMBER 4:**

- (4) What sum of money, if any, if paid now in cash, would fairly and reasonably compensate the plaintiff for her compensatory damages, if any, that resulted from the sexual harassment, violation of bodily integrity, and/or the intentional infliction of emotional distress?

Answer in dollars and cents as to each plaintiff:

- a. Mikki Kalina \$50,000
- b. Estella "Christy" Strawn \$100,000
- c. Rebecca "Becky" Sirmans \$50,000

**INTERROGATORY NUMBER 5:**

- (5) Did James Blackstock act intentionally, with callous indifference, or with reckless disregard when harassing and/or violating the bodily integrity of the plaintiff?

Each plaintiff has the burden of proof on her individual claim by a preponderance of the evidence.

Answer "Yes" or "No" as to each plaintiff:

- a. Mikki Kalina YES
- b. Estella "Christy" Strawn YES
- c. Rebecca "Becky" Sirmans YES

Only if you have answered Interrogatory Number 5 "Yes" as to one or more of the plaintiffs, then answer Interrogatory Number 6.

**INTERROGATORY NUMBER 6:**

(6) What sum of money, if any, do you award the plaintiff as punitive damages?

Answer as to each plaintiff:

- a. Mikki Kalina \$1,000,000
- b. Estella "Christy" Strawn \$1,000,000
- c. Rebecca "Becky" Sirmans \$1,000,000

We, the jury, have answered the above and foregoing questions as herein indicated, and herewith return our unanimous verdict into Court.

  
Jury Foreperson

July 15, 2011  
Date